REMARKS

Claims 1-21 are pending in the Application.

Claims 1-21 stand rejected.

New claims 22-27 have been added.

Applicants appreciate the Examiner discussing his rejection over the telephone, and specifically pointing out that he was asserting that item 112 in FIG. 1B of *Rajaraman* is teaching "graphical data."

I.   SPECIFICATION

The Specification has been objected to, with the Examiner requesting that the serial numbers in the cross-referenced applications be inserted. Applicants have amended this portion of the Specification to include such serial numbers.

II.   REJECTIONS UNDER 35 U.S.C. § 102

Claims 1-3, 6-10, 13-17 and 20-21 stand rejected under 35 U.S.C. § 102(e) as being anticipated by *Rajaraman et al.* (U.S. Patent No. 6,366,910). In response, Applicants respectfully traverse this rejection. As the Examiner is well aware, for a claim to be anticipated under 35 U.S.C. § 102, each and every element of the claim must be found within the cited prior art reference. Claim 1 recites analyzing a set of graphical data to determine a set of critical factors present in the graphical data. The Examiner asserts that this limitation is taught in column 4, lines 10-14 of *Rajaraman*. Applicants respectfully disagree. Column 4, lines 10-14 of *Rajaraman* states the following:

> The user enters the search criteria or query into search
> query box 106. In this example, the user has entered
> the word "shirts" as the search criteria. Display 110 of
> FIG. 1B illustrates the display of the search results.
> Rather than displaying the particular items that best
> match the search criteria, the GPS system displays the

classifications of items that best match the search criteria.

GPS stands for General Purpose Searching in *Rajaraman*. As shown in FIG. 1A of *Rajaraman*, a search for "shirts" is initiated by a user typing in the word "shirts" into box 106. The GPS system then performs a search on the web site, and the results are listed in item 112 in FIG. 1B, as a textual listing (*Rajaraman* further discloses that images of the items are <u>not</u> shown). The important difference between the claims of the present invention and the teachings of *Rajaraman* is that there is no analyzing of graphical data in *Rajaraman*. Searching a web site using a textual search term is not the same as analyzing a set of graphical data. The Examiner cannot go beyond a reasonable interpretation of the term "graphical data." Words of a claim must be given their plain meaning; in other words, they must be read as they would be interpreted by those of ordinary skill in the art. MPEP § 2111.02. One skilled in the art would clearly understand that the term "graphical data" means data that is used by a computer system to display an image, which is not the same as text. "Graphics data structure" is defined as a data structure that is designed specifically for representing one or more elements of the graphical image. COMPUTER DICTIONARY, Microsoft Press, copyright 1991, page 163. The data analyzed in *Rajaraman* is text, which is not graphics data used to create an image on a computer display.

Likewise, *Rajaraman* does not teach the step of generating a textual description of the set of graphical data. The HTML code shown as label 112 in FIG. 1B of *Rajaraman* is not graphical data, but is instead text or textual data. In fact, HTML stands for HyperText Markup Language, and is defined as ASCII text surrounded by HTML commands which a browser interprets. NEWTON'S TELECOM DICTIONARY, Harry Newton, 17th Ed., page 335. Thus, textual data is displayed in FIG. 1B, but this textual data is not generated as a description of a set of graphical data, but itself is merely the result of a search of textual data by a general purpose searching engine.

As a result of the foregoing, Applicants respectfully assert that claim 1 is not anticipated by *Rajaraman*. Likewise, for similar reasons, claims 8 and 15 are also not anticipated by *Rajaraman*.

II.   REJECTIONS UNDER 35 U.S.C. § 103

Claims 4-5, 11-12 and 18-19 stand rejected under 35 U.S.C. § 103 as being unpatentable over *Rajaraman* in view of *Hasser et al.* (U.S. Patent No. 5,736,978). In response, Applicants respectfully traverse this rejection. Since *Rajaraman* does not teach the limitations of claims 1, 8 and 15, then the combination of *Rajaraman* and *Hasser* does not render obvious claims 4-5, 11-12 and 18-19, since these claims depend from claims 1, 8, or 15.

III.   CONCLUSION

As a result of the foregoing, it is asserted by Applicants that the remaining claims in the Application are in condition for allowance, and respectfully request an early allowance of such claims.

Applicants respectfully request that the Examiner call Applicants' attorney at the below listed number if the Examiner believes that such a discussion would be helpful in resolving any remaining problems.

Respectfully submitted,

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